

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)
Karen Parker)
)
) Case No. 12-45010
Debtor(s)) Chapter 13
)

NOTICE OF FILING

PLEASE TAKE NOTICE THAT THE DEBTOR HAS FILED THIS MOTION TO USE INSURANCE PROCEEDS. FAILURE TO RESPOND TO THIS MOTION WITHIN 21 DAYS OF THE DATE OF THIS MOTION MAY RESULT IN A DEFAULT ORDER BEING GRANTED. IF AN OBJECTION IS FILED, IT MUST BE SERVED ON SEAN C PAUL, ATTORNEY FOR DEBTOR, 8917 GRAVOIS RD, ST LOUIS MO 63123 AND ON JOHN V. LABARGE, TRUSTEE, P.O. BOX 430908, ST. LOUIS, MO 63143. ANY OBJECTION MUST BE FILED IN WRITING WITH THE BANKRUPTCY COURT, 111 S. 10TH STREET, 4TH FLOOR, ST. LOUIS, MO 63102

DEBTORS' MOTION TO RETAIN BALANCE OF INSURANCE PROCEEDS

COMES NOW Debtor, and for this Motion, states to the Court as follows:

1. Debtor filed for relief on 05/23/2012. The Plan was first confirmed on 07/18/2012.
2. The Debtor's confirmed plan calls for payments to be made to Alliance Credit Union. The loan is secured by a 2005 Ford Focus.
3. The debtor was recently in a car accident. As a result of that accident, the 2005 Ford Focus was totaled.
4. Debtor's loss was insured, and the insurance company State Farm, has paid Alliance Credit Union that balance of \$1,372.07. The insurance company is holding an equity check for the debtor in the amount of \$3538.73.
5. Debtor is in need of another vehicle. As such, debtor requests permission to use the \$3538.73 to purchase a vehicle and to pay for any needed repairs, and pay taxes and licensing. Debtor does not plan to finance any portion of this transaction. If debtor has any funds left over after purchasing the vehicle, making any reasonable repairs to it, and paying title and licensing, debtor will turn over that balance to the Chapter 13 Trustee.

WHEREFORE, Debtor(s) pray that this Motion be granted and that debtor be permitted to use the \$3538.73 to purchase a vehicle.

Dated: 04/23/2014

/s/ Sean C. Paul
Sean C. Paul 59371MO
8917 Gravois Rd
St. Louis MO 63123
314-827-4027
314-222-0619 FAX
scp@stlbankruptcyfirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above-named Debtor(s) Motion to Retain Tax Refund and Notice were served by the ECF System electronically or by First Class Mail to all parties on the attached matrix on April 23, 2014.

Respectfully Submitted,

/s/ Sean C. Paul
Sean C. Paul

0865-4

Case 12-45010

Eastern District of Missouri

St. Louis

Wed Apr 23 11:26:09 CDT 2014

MIDLAND FUNDING UNION

575 RUDDER RD Pg 3 of 4

FENTON, MO 63026-2005

BANK OF AMERICA, N.A.

450 AMERICAN ST

SIMI VALLEY, CA 93065-6285

(p)CAPITAL ONE

PO BOX 30285

SALT LAKE CITY UT 84130-0285

CENTRAL FINL CONTROL (original creditor:

PO BOX 66051

ANAHEIM, CA 92816-6051

CHASE

PO BOX 15298

WILMINGTON, DE 19850-5298

CITFINGERHUT

6250 RIDGEWOOD ROA

SAINT CLOUD, MN 56303-0820

CONSUMER COLLECTION MN (original creditor:

2333 GRISSOM DR

SAINT LOUIS, MO 63146-3322

Capital One Bank (USA), N.A.

PO Box 71083

Charlotte, NC 28272-1083

FIRSTSOURCE ADVANTAGE (original creditor)

7650 MAGNA DR

BELLEVILLE, IL 62223-3366

GECRB/JCP

PO BOX 984100

EL PASO, TX 79998

HSBC BANK

PO BOX 5253

CAROL STREAM, IL 60197-5253

METABNK/FHUT

6250 RIDGEWOOD ROA

SAINT CLOUD, MN 56303-0820

MIDLAND FUNDING (original creditor:CHASE)

8875 AERO DR STE 200

SAN DIEGO, CA 92123-2255

Midland Credit Management, Inc.

8875 Aero Drive, Suite 200

San Diego, CA 92123-2255

Missouri Department of Revenue

P.O. Box 475

Jefferson City, MO 65105-0475

Office of U.S. Trustee

111 South Tenth Street

Suite 6353

St. Louis, MO 63102-1125

Orthopedic Specialists PC

PO Box 790051

St. Louis MO 63179-0051

PORTFOLIO RECVRY&AFFIL (original creditor)

120 CORPORATE BLVD STE 1

NORFOLK, VA 23502-4962

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

SOUTHN CML B

5515 S GRAND

ST LOUIS, MO 63111-1899

(p)SPRINGLEAF FINANCIAL SERVICES

P O BOX 3251

EVANSVILLE IN 47731-3251

Shop N Save

Attn. Payroll Department

2501-1 W. Grandview Rd

Phoenix, AZ 85023-3105

John V. LaBarge Jr

Chapter 13 Trustee

P.O. Box 430908

St. Louis, MO 63143-0908

Karen R. Parker

270 Kingston Dr. Apt A

St. Louis, MO 63125-2908

MaryAnn G. Kier

The Law Offices of Paul and Kier, PC

8917 Gravois Rd.

St. Louis, MO 63123-4623

End of Label Matrix

Mailable recipients	26
Bypassed recipients	0
Total	26